

**RATIONALE FOR PROPOSED DELETION  
OF EXISTING  
ACCESS COMPLIANCE POLICY  
BY THE  
DIVISION OF THE STATE ARCHITECT – ACCESS COMPLIANCE**

Division of the State Architect – Access Compliance (DSA/AC) under authority assigned in California Government Code Section 4451(f) to carry out the legislative mandate of California Government Code Section 4452 has established a set of access compliance policies addressing aspects of DSA's plan and construction review program. Policies may require revision or deletion as corrections are made to existing regulations and/or new regulations are adopted into the code.

Access compliance policies can be found on the DSA website in the 2003 California Access Compliance Reference Manual at <http://www.documents.dgs.ca.gov/dsa/pubs/policies.pdf>.

DSA/AC is proposing to delete the following access compliance policies:

**94-18 Ramp Landing Clearances at Doors**

Rationale: The provisions of this policy have been adopted into the California Building Code. DSA/AC has adopted section 1003.3.4.4-Landings, paragraph 2 which states, "Doors in any position shall not reduce the width of the landing to less than 42 inches . . ." In the 2004 Annual Code Adoption Cycle, DSA/AC is proposing to adopt new section 1003.3.4.4.1-Landings which would more clearly identify which provisions for landings are applicable to DSA/AC.

**95-02 Single Room Occupancy – Hotels**

Rationale: The California Building Code does not define single room occupancy or contain provisions for single room occupancy facilities operated as transient lodging but used by residents as long term housing. DSA/AC proposes to delete this policy, but add information and discussion regarding this subject to DSA's "Frequently Asked Questions on Accessibility" web page.

**96-04 Elevator Call Buttons – Mounting Height**

Rationale: The provisions of this policy have been adopted into the California Building Code Section 1116B.1.10.

**97-07 Top and Bottom Landings at Relocatable Classroom Buildings**

Rationale: The provisions of this policy conflict with current California Building Code regulations. Ramp landings shall comply with DSA/AC adopted section 1003.3.4.4-Landings, paragraph 2 which states, "Doors in any position shall not reduce the width of the landing to less than 42 inches . . ."

**97-11 Over-The-Counter Approvals for Existing Restrooms**

Rationale: This is an obsolete policy related to plan review operations.

## **97-12 Access Code Adoption to the Metric System**

Rationale: Metric conversions have been incorporated into the California Building Code. The metric conversions are provided in parenthesis following the English units. Where industry has made metric conversions available, the conversions conform to current industry standards.

## **98-06 Signs**

Rationale: The provisions of this policy have been adopted into the California Building Code. Sections 1003.2.8.6 and 1003.3.2.8.6.1 identify requirements of tactile exit signage. Section 1003.3.13.1 identifies requirements of tactile stair level identification signage. Code requirements for the finish and contrast of signage materials; proportion, height and type of signage characters; pictorial symbols; Braille; and the location and mounting heights of signs are identified in sections 1117B.5.2-7.

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**BEVELED LIP AT CURB RAMPS****DRAFT****IR 04-01**

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Reference: California Building Code Sections 1117A.4.3, 1117A.4.5, 1127B.5 Items 3 & 5, California Government Code Section 4451(d).

This interpretive regulation is applicable to projects under Division of the State Architect, Access Compliance (DSA/AC) jurisdiction only; this authority encompasses state-funded buildings, facilities and universities, as well as publicly funded elementary schools, secondary schools, and community colleges. Local authorities may or may not adopt similar methods of administering current code requirements, determining equivalent facilitation or defining acceptable parameters when enforcing the California Building Standards Code. [Reference California Government Code Section 4451(f)]

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**Issue:** The California Building Code (CBC) Section 1127B.5 Item 3 states: "Transitions from ramps to walks, gutters, or streets shall be flush and free of abrupt changes, except that curb ramps shall comply with Item 5 below." CBC Section 1127B.5 Item 5 states: "The lower end of each curb ramp shall have a 1/2 inch (13 mm) lip beveled at 45 degrees as a detectable way-finding edge for persons with visual impairment."

However, the Americans with Disabilities Act Accessibility Guidelines (ADAAG) Section 4.7.2 does not allow for a beveled lip at the lower end of a curb ramp and states: "Transitions from ramps to walks, gutters, or streets shall be flush and free of abrupt changes."

**Resolution:** Until such building standards are published in the California Building Standards Code that meet or exceed the requirements of the federal Americans with Disabilities Act, and specifically in this case ADAAG Section 4.7.2, the DSA will encourage and accept curb ramp designs which indicate that the lower end of each curb ramp is flush and free of abrupt changes, without a beveled lip. All such curb ramp designs shall incorporate a detectable warning surface (truncated domes) as indicated in other sections of the CBC, and also as contained in DSA Interpretive Regulation 04-02.

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**DETECTABLE WARNINGS****DRAFT****IR 04-02**

Reference: California Building Code, Sections 1117A.4.7, 1127B.5 Item 8, 1133B.8.3; California Government Code Section 4451(d).

This interpretive regulation is applicable to projects under Division of the State Architect, Access Compliance (DSA/AC) jurisdiction only; this authority encompasses state-funded buildings, facilities and universities, as well as publicly funded elementary schools, secondary schools, community colleges, and housing. Local authorities may or may not adopt similar methods of administering current code requirements, determining equivalent facilitation or defining acceptable parameters when enforcing the California Building Standards Code. [Reference California Government Code Section 4451(f)]

**Issue 1:** California Building Code (CBC) Sections 1127B.5 Item 8 and 1117A.4.7 state “a curb ramp shall have a detectable warning...when the ramp slope is less than 1 unit vertical to 15 units horizontal (6.7% slope).” However, the Americans with Disabilities Act Accessibility Guidelines (ADAAG) Section 4.7.7 indicates that curb ramps shall have a detectable warning surface without regard to the slope of the ramp.

**Issue 2:** The CBC indicates technical criteria for detectable warning surfaces (truncated domes). The technical criteria include dome pattern, dome spacing, dome size, and dimensional placement.

The original Americans with Disabilities Act (ADA) standards for detectable warnings are found in the ADAAG. The U.S. Access Board (USAB) develops the minimum design standards for complying with the ADA, and has also developed and considered detailed research studies regarding pedestrians and the use of detectable warning surfaces. Under the USAB, the Public Rights-of-Way Access Advisory Committee was established in 1999 to develop additional ADAAG provisions. The advisory committee reached agreement on recommended accessibility standards for new and altered public rights-of-way covered by the ADA. The standards proposed by the committee were presented in a report titled *Building a True Community*. The draft guidelines issued by the USAB, consistent with the advisory committee’s recommendations, include revised technical criteria for detectable warnings.

The U.S. Department of Transportation (USDOT) is a designated agency responsible for enforcing the standards and implementing regulations of the ADA Title II (State and Local Government Services). The Federal Highway Administration (FHWA), under the USDOT, is the enforcement authority for overseeing pedestrian discrimination issues under the Title II implementing regulations. Both FHWA and the USAB are encouraging the use of the new technical criteria for detectable warnings over the original ADA design standard.

**Resolution:** The Division of the State Architect (DSA) recognizes the federal research effort and that the new technical criteria provide substantially equivalent or greater access and usability. Therefore, the DSA joins the federal agencies in encouraging their use.

Regarding the dome pattern, dome size, and dome spacing for detectable warnings, the DSA encourages and will accept detectable warning surfaces that comply with the following:

1. Pattern: Detectable warnings shall consist of a surface with truncated domes that are aligned in a square grid (in-line) pattern.
2. Dome Size: Truncated domes in a detectable warning surface shall have a base diameter of 0.9 inches (23 mm) minimum to 1.4 inches (36 mm) maximum, a top diameter of 50% minimum of the base diameter to 65% maximum of the base diameter, and a height of 0.2 inches (5 mm).

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3. Dome Spacing: Truncated domes in a detectable warning surface shall have a center-to-center spacing of 1.6 inches (41 mm) minimum to 2.4 inches (61 mm) maximum, and a base-to-base spacing of 0.65 inches (16 mm) minimum, measured between the most adjacent domes on the square grid.

In addition to the above criteria regarding the detectable warning surface placement at curb ramps, the DSA encourages and will accept detectable warning designs that comply with the following criteria:

#### 4. Placement:

(1) The detectable warning surface shall extend 36 inches (914 mm) minimum in the direction of travel for the full width of the curb ramp and shall be located so that the edge nearest the curb line is 6 inches (152 mm) minimum and 8 inches (203 mm) maximum from the curb line.

(2) Until such building standards are published in the California Building Standards Code that meet or exceed the requirements of the federal Americans with Disabilities Act, and specifically in this case ADAAG Section 4.7.7, the DSA will encourage and accept curb ramp designs which indicate detectable warnings at all curb ramps.

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**VISUAL ALARMS IN CLASSROOMS**

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**IR 04-03**

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Reference: California Government Code 4451(d), Americans with Disabilities Act Accessibility Guidelines 4.1.1(1) & 4.1.3(14), California Building Code Section 3501.1 Sec. 4-4.5.

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**Issue:** Unlike audible alarms, visual alarms are typically located within the space they serve so the signal is visible to the occupants of the space. The Americans with Disabilities Act Accessibility Guidelines (ADAAG) Section 4.1.3 (14) indicates that when emergency warning systems are provided, they shall include both audible and visual alarms. Since classrooms in newly constructed buildings are required to be accessible by Section 4.1.1 (1), where audible alarm coverage is provided, the emergency warning system shall also provide visual alarm coverage.

**Resolution:** Until such building standards are published in the California Building Standards Code that meet or exceed the requirements of the federal Americans with Disabilities Act, specifically in this case ADAAG Section 4.1.3 (14), effective September 1, 2004, DSA will accept construction documents for new construction (new buildings) that indicate visual fire alarm coverage for all classrooms<sup>1</sup> that are provided with audible fire alarm coverage.

<sup>1</sup> United States Architectural and Transportation Barriers Compliance Board: ADAAG Manual, A guide to the Americans with Disabilities Act Accessibility Guidelines, July 1998, p. 98, Visual Alarms (4.28.3); Technical Bulletin #2: Visual Alarms, July 1994, <<http://www.access-board.gov/publications/2-VisualAlarms/a7.htm>>; Specific ADAAG Provisions, Technical and Scoping Requirements, Visual Alarms (4.28.3) <<http://www.access-board.gov/adaag/about/4.28.htm>>

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## TRAVEL DISTANCE TO ACCESSIBLE SANITARY FACILITIES

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Reference: California Building Code Sections 1117A.4.5; 1127B.5, Item 3 & 5

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**Issue:** California Building Code (CBC) Section 1134B.2 indicates that when alterations, structural repairs or additions are made to existing buildings or facilities, sanitary facilities serving the specific area of alteration shall comply with all provisions for new buildings, unless the exceptions contained within that section are utilized.

When alterations, structural repairs or additions to existing buildings or a complex of buildings are proposed, it is often difficult to determine specifically which existing sanitary facilities to upgrade for accessibility. This is due to the complexity of various site designs (such as at schools) that may contain several existing sanitary facility locations, often varying in their level of accessibility compliance.

CBC Section 1114B.1.2 states that “the accessible route shall, to the maximum extent feasible, coincide with the route for the general public.” Additionally, the exception to CBC Section 1115B.1 indicates that in existing buildings or facilities, when the enforcing agency determines that compliance with the building standards would create an unreasonable hardship, exceptions shall be granted when equivalent facilitation is provided. When equivalent facilitation is used, the exception indicates that all sanitary facilities are not required to comply with the building standards when the enforcing agency determines that sanitary facilities are accessible to and usable by persons with disabilities within a *reasonable distance* of accessible areas.

**Resolution:** The DSA will accept designs that demonstrate equitable travel distances from alterations, structural repairs or additions to the accessible sanitary facility facilities that serve such areas. For the purposes of applying CBC Section 1115B.1 under unreasonable hardship, a *reasonable distance* to accessible sanitary facilities will be considered as 200 feet or less (610 m) beyond the travel distance for which non-disabled persons travel to reach the closest available non-accessible sanitary facilities. In cases where this distance is exceeded, such designs shall be evaluated by the DSA on a case-by-case basis to confirm that equity in routing is provided to the maximum extent feasible.

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